Approved:

DOE/WIPP 06-3351

# **AUTHORITY APPROVAL**

# Safety Evaluation Report of the Waste Isolation Pilot Plant Remote Handled TRU Technical Safety Requirements, Revision 0, Change 6

# U. S. Department of Energy Carlsbad Field Office

| Date:                                      | November 2006                            |                  |
|--|--|------------------|
| Richard Farrell, DOI                       | Review Team Leader.                      | Date: 11/30/2006 |
| Lloyd L. Piper, CBF                        | O DepubriManager                         | Date: 1/30/25    |
| David C. Moody, CI                         | FO Manager                               | Date: 1/30/02    |
| Dae Y. Chung, Depu<br>Secretary for Safery | ity Assistant Management and Operations, | Date: 12/7/06    |

Office of Environmental Management

# 1.0 INTRODUCTION

This Safety Evaluation Report (SER) addresses the Change 6 request to the Waste Isolation Pilot Plant (WIPP) Remote Handled (RH) TRU Waste Technical Safety Requirements (TSRs) Revision 0 as submitted to the Carlsbad Field Office by the Waste Isolation Pilot Plant (WIPP) Management and Operation (M&O) Contractor in the memorandum dated November 15, 2006, "Transmittal of the Page Change RH-2006-006 for Review and Approval." During the Implementation Verification Review (IVR) process, WTS identified the need for a consistency change to the RH TSRs. The TSR Revision 0 is being revised to address clarification of the definition of operable for LCO 3.3.2 Upper Hot Cell and Facility Cask Loading Room pintle contact interlocks with the pivot dogs.

#### 2.0 REVIEW PROCESS

Incorporation of these changes is recommended to the Approval Authority based upon review of the specific change and associated supporting documentation by the CBFO staff, with assistance from the CBFO Technical Assistance Contractor (CTAC). This involved verification of the technical accuracy, completeness, and defensibility of the proposed page change to the RH TSRs and their bases statements, and verifying that the TSR changes are consistent with the derivation of controls in the RH TRU Documented Safety Analysis (DSA), Revision 0. This SER is prepared by the approval authority in accordance with the guidance provided in DOE-STD-1104-96, *Review and Approval of Nonreactor Nuclear Facility Safety Analysis Reports*. This review provides the Director, Deputy Assistant Secretary for Safety Management and Operations, DOE Office of Environmental Management (approval authority), with the basis for approval of this change.

# 3.0 APPROVAL BASES

The change deletes reference to the "contact proximity switch contact is closed" and refers only to the pintle contact indication lights on the respective hot cell crane and FCLR panel 411 control panels for the LCO 3.3.2 Upper Hot Cell and Facility Cask Loading Room pintle contact interlocks with the pivot dogs. The RH DSA Chapter 3 hazards evaluation identifies the safety interlock for Facility Worker and Site Worker protection, which does not specifically address the pintle contact proximity switch contact position. The RH DSA Section 4.4.4, "Upper Hot Cell Crane Grapple and FCLR Grapple Hoist Grapple", establishes the safety significant requirements for the interlock, and does not address proximity switch contact position requirements. The RH DSA Sections 5.5.5.1 and 5.5.5.2 provide the derivation of TSR LCO and Surveillance Requirements, which currently includes the "contact proximity switch contact is closed" designation. However, the proximity switch contact position designation is not necessary to specifically identify the pintle contact indicating lights that are relied on to perform the two Surveillance Requirements 4.3.2.1 and 4.3.2.2. Therefore, deleting the proximity switch contact closed designation from the TSRs is appropriate. In addition to revisions to the LCO 3.3.2 statement and the Surveillance Requirements to delete reference to the proximity switch contact being closed, the TSR bases discussions in Appendix A are also revised.

The DSA Chapter 4 and 5 page changes are not being revised at this time; any necessary changes will be incorporated into the next annual update when the CH and RH DSAs and TSRs will be combined. Revising them at this time is not needed to support Change 6 to the RH TSRs Revision 0.

# 4.0 RESULTS

The review resulted in confirmation that the RH TSR Revision 0 Change 6 is accurate and complete to establish the LCO and Surveillance requirements, and is consistent with the DSA Revision 0 Chapters 3, 4, and 5 as discussed above.

It is the judgment of the reviewers that the RH TSR Revision 0 Change 6 meets the 10 CFR 830 Subpart B requirements and DOE guidance, and that the implementation of these TSR changes are appropriate for the contractor to operate as established by the safety basis.

# 5.0 CONDITION OF APPROVAL

No conditions of approval are necessary for the Change 6 to Revision 0 of the RH TSRs.

# 6.0 CONCLUSIONS

Based on the reviewers' assessment of Change 6 to Revision 0 of the RH TSRs, and the evaluation of the approval authority, it is concluded that the changes are consistent with the derivation of controls in the RH Waste DSA. Change 6 to Revision 0 of the RH TSRs is thus approved for release.